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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10
11 DIANE SANCHEZ,

12 Plaintiff,

13 vs.

14 WINDHAVEN NATIONAL INSURANCE
15 COMPANY, a domestic corporation;
16 WINDHAVEN NATIONAL INSURANCE
COMPANY fka ATX PREMIER
17 INSURANCE, a domestic corporation; DMA
18 CLAIMS INC., a foreign corporation; BLAS
19 BON, an individual; DOES I-X and ROE
CORPORATIONS I-X, inclusive,

20 Defendants.
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CASE NO.: 2:19-cv-02196-RFB-VCF

**STIPULATION AND [PROPOSED
ORDER] FOR EXTENTION OF
TIME TO FILE OPPOSITION TO
DMA CLAIMS, MANAGEMENT,
INC.'S MOTION TO DISMISS
FIRST AMENDED COMPLAINT**

(Second Request)

**AND FOR EXTENSION OF TIME
TO FILE OPPOSITION TO DMA
CLAIMS MANAGEMENT, INC.'S
MOTION TO STAY PURSUANT
TO INJUNCTION OR,
ALTERNATIVELY, MOTION TO
STAY DISCOVERY**

(First Request)

22 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff DIANE
23 SANCHEZ, through her counsel of record, Dennis M. Prince and Kevin T. Strong of
24 PRINCE LAW GROUP, and Defendant DMA CLAIMS MANAGEMENT, INC., by and
25 through its counsel of record, Robert E. Schumacher and Wing Yang Wong of GORDON
26 REES SCULLY MANSUKHANI, LLP, that the deadline for Plaintiff to file her
27 Opposition to DMA Claims Management, Inc.'s Motion to Dismiss First Amended
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1 Complaint (ECF No. 27) shall be extended by seven (7) days, from May 1, 2020 to May
 2 8, 2020. The Motion was filed on April 2, 2020. This is the second request for extension
 3 of time to file an opposition to this motion.

4 IT IS FURTHER STIPULATED AND AGREED that the deadline for Plaintiff to
 5 file her Opposition to DMA Claims Management, Inc.'s Motion to Stay Pursuant to
 6 Injunction or, alternatively, Motion to Stay Discovery (ECF Nos. 30, 31) shall be
 7 extended by two (2) days from May 6, 2020 to May 8, 2020. The Motion was filed on
 8 April 22, 2020. This the first request for extension of time to file an opposition to this
 9 motion. This Stipulation and [Proposed Order] is submitted in accordance with LR IA
 6-1.

10 As this Court is aware, this matter continues to be stayed as to Defendants
 11 Windhaven National Insurance Company and Blas Bon. (ECF Nos. 25, 25-1). Over the
 12 course of the last couple of weeks, Plaintiff's counsel has been preparing and finalizing
 13 a petition for rehearing and rehearing *en banc* in the matter of *Volungis et al. v. Liberty*
 14 *Mutual Fire Ins. Co.*, Case No. 18-16600 before the Ninth Circuit Court of Appeals.
 15 Although Counsel prepared this petition concurrently with the oppositions to the
 16 respective motions filed by DMA Claims Management, Inc., additional time is needed to
 17 ensure the issues presented by the motions are fully addressed to aid this Court in its
 18 decision. This brief extension of time requested will allow Plaintiff's counsel to achieve
 19 this result as well as prepare his own motion addressing the scope of the stay as it relates
 20 to DMA Claims Management, Inc.

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1 Accordingly, the parties respectfully request this Court to approve the foregoing
2 stipulation. This requested extension is not made in bad faith or to unnecessarily delay
3 these proceedings.

4 DATED this 1st day of May, 2020.

DATED this 1st day of May, 2020

5 **PRINCE LAW GROUP**

**GORDON REES SCULLY MANSUKHANI,
LLP**

6
7 /s/ Kevin T. Strong

/s/ Wing Yan Wong

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14 Attorneys for Plaintiff

Attorneys for Defendant

15 *Diane Sanchez*

DMA Claims Management, Inc.

16
17 **ORDER**

18 **IT IS SO ORDERED.**

19 DATED this 8th day of May, 2020.

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21 
22 RICHARD F. BOULWARE, II
23 UNITED STATES DISTRICT JUDGE
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